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June 12, 2012

VIA ECF

The Honorable Judge William F. Kuntz, II
United States District Court for the
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *Shirley Wrubel, as Trustee of the Sara Hollander Irrevocable Life
Insurance Trust v. John Hancock Life Insurance Company,*
Docket No. 11-cv-01873 (WFK)(LB)

Dear Judge Kuntz:

We represent Defendant, John Hancock Life Insurance Company (U.S.A.) ("John Hancock"), and write to clarify John Hancock's position with respect to the letter from Mr. BenHaim dated June 12, requesting that fact discovery be extended through August 15, 2012 and the parties submit letters concerning their intent to file summary judgment motions by August 31, 2012.

John Hancock advised plaintiff's counsel it had no objection to their applying to Magistrate Judge Bloom for an order extending fact discovery to August 1, 2012, the date Magistrate Bloom has ordered expert discovery to be completed. [Dkt. # 35]. Our understanding was all other dates set by Magistrate Judge Bloom would remain: expert reports, if any, exchanged on July 1; all discovery completed by August 1; and the parties would submit a letter to Your Honor by August 15, concerning their intent to file a motion for summary judgment. [Dkt. # 35].

Respectfully submitted,

/s/ Sean R. Flanagan

Sean R. Flanagan

cc: Magistrate Bloom (via ECF)
Ira Lipsius, Esq. (via ECF)
David BenHaim, Esq. (via ECF)